

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION**

FULFILLSOURCE, LLC D/B/A  
CREWBACK,

Plaintiff,

V.

TRAVELERS CASUALTY AND  
SURETY COMPANY OF AMERICA,  
BERKSHIRE HATHAWAY SPECIALTY  
INSURANCE COMPANY, and  
ANDERSON COLUMBIA CO., INC.,

Defendants.

CIVIL ACTION NO.:

## NOTICE OF REMOVAL

In accordance with Sections 1441 and 1446 of Title 28 of the United States Code, Defendants Travelers Casualty and Surety Company of America (“Travelers”), Berkshire Hathaway Specialty Insurance Company (“Berkshire”), and Anderson Columbia Co., Inc., (“Anderson”) (collectively, “Defendants”) hereby remove the above-captioned matter from the 79th Judicial District Court of Jim Wells County, Texas to this Court. Subject matter jurisdiction lies in this Court for the reasons set forth below:

1. Plaintiff Fulfillsource LLC, d/b/a Crewback (“Fulfillsource”) filed an action against Defendants in the Jim Wells County District Court, which was assigned Cause No. 24-09-64164-CV. Travelers and Anderson were served with the Original Petition on April 29, 2025 and Berkshire was served on May 1, 2025. A full copy of the Original Petition is attached hereto as **Exhibit A**. Full copies of the executed process are attached hereto as **Exhibit B**.

2. No other pleadings have been filed and no other proceedings have taken place in the Jim Wells County District Court action prior to this Notice of Removal. The Docket Sheet is attached hereto as **Exhibit C**.

3. This is a civil action in which Fulfillsource alleges damages against the Defendants exceeding \$250,000. (Ex. A, at ¶ 1.)

4. The Petition alleges that Fulfillsource is a Texas limited liability company authorized to and doing business in Jim Wells County, Texas. (Ex. A, at ¶ 2.)

5. The Petition alleges that Travelers is a Connecticut corporation authorized to do business in Jim Wells County, Texas. (Ex. A, at ¶ 3.)

6. The Petition further alleges that Berkshire is a Nebraska corporation authorized to do business in Jim Wells County, Texas. (Ex. A, at ¶ 4.)

7. The Petition further alleges that Anderson is a Florida corporation authorized to do business in Jim Wells County, Texas. (Ex. A, at ¶ 5.)

8. None of the Defendants are citizens of Texas.

9. Upon information and belief and evidenced by Fulfillsource's registration with the Texas Secretary of State as a domestic limited liability company, all members of Fulfillsource (and derivative members of any LLC members) are citizens of Texas and/or have their principal place of business in Texas. A copy of Fulfillsource's registration with the Texas Secretary of State is attached as hereto as **Exhibit D**.

10. Furthermore, the amount in controversy in this action exceeds \$75,000.00, exclusive of interest and costs. Accordingly, complete diversity of citizenship exists between Fulfillsource and Defendants and the amount in controversy threshold has been exceeded.

11. For the foregoing reasons, this action may be removed to this Court pursuant to Section 1441 of Title 28 of the United States Code because it falls within the original jurisdiction of this Court under Section 1332 of Title 28 of the United States Code.

12. Pursuant to 28 U.S.C. § 1446(d), Fulfillsource's counsel and the Clerk of the Jim Wells County District Court will be promptly notified in writing of this Notice of Removal.

WHEREFORE, Defendants Travelers Casualty and Surety Company of America, Berkshire Hathaway Specialty Insurance Company, and Anderson Columbia Co., Inc., hereby remove this action filed by Plaintiff Fulfillsource LLC, d/b/a Crewback to the United States Court for the Southern District of Texas, Corpus Christi Division.

Respectfully submitted,

/s/ John J. Rastoka  
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**ATTORNEYS FOR DEFENDANTS**

**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the foregoing has been forwarded to all counsel listed below on May 19, 2025, via e-service and/or e-mail:

/s/ John J. Rastoka  
John J. Rastoka